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October 13, 2020

Ms. Luly Massaro, Clerk Rhode Island Division of Public Utilities and Carriers 89 Jefferson Boulevard Warwick, RI 02888

Re: The Narragansett Bay Commission - Docket 5022 In Re: Suspension Of Service Terminations And

Certain Collection Activities During The COVID-19 Emergency

Dear Ms. Massaro:

Enclosed herewith please find an original and nine copies of the Narragansett Bay Commission's Response to the Rhode Island Public Utilities Commission's Data Requests On The Quantification of Waived Fees.

Thank you for your attention to this matter.

Sincerely,

Joseph A. Keough, Jr.

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Enclosures

cc: Service List via electronic mail

Comm. 1-1: Does the Narragansett Bay Commission typically charge late fees to customers? If so, please provide the tariff reference and the types of customers to whom the late fee applies.

Response: No.

Comm. 1-2: Does the Narragansett Bay Commission typically charge interest on overdue balances to customers? If so, please provide the tariff reference and the types of customers to whom the interest charge applies.

Response: Yes. Interest fees are charged to Residential, Commercial and Industrial sewer customers pursuant to Schedule A of Tariffs of the Narragansett Bay Commission.

"PAYMENT – All bills are due and payable upon receipt. Interest will be charged 30 days after the billing date at the rate of 1% per month on any unpaid balance, including any outstanding interest charges."

Comm. 1-3: Does the Narragansett Bay Commission typically pass through to the user the so called "convenience fees" associated with paying with credit cards or debit cards?

Response: Yes, NBC's tariffs sets forth convenience fees for credit card payments, which are paid by the customer.

Comm. 1-4: Does the Narragansett Bay Commission typically pass through to the user the so called "convenience fees" associated with paying with an ACH/electronic check?

Response: No.

Comm. 1-5: Does the Narragansett Bay Commission intend to seek recovery of the costs associated with the absorption of the applicable fees?

Response: At this time, NBC does not intend to seek recovery of costs associated with the absorption of the applicable fees at this time. However, given the significance of the interest charges, if the PUC's Order is extended, NBC may seek to recover the revenue shortfall in the future.

Comm. 1-6: Please indicate the date upon which Narragansett Bay Commission ceased charging customers for late fees, interest fees, credit card/debit card payment fees, or ACH/check fees (please list each separately, even if the date is the same) as a result of the Commission's decision.

Response: Late Fees: Not applicable Interest Fees: May 14, 2020

Credit card/debit card payment fees: April 21, 2020

ACH/Check fees: Not applicable

Comm. 1-7: Utilities only collect late fees and interest fees on accounts for which payments are made. Similarly, credit card/debit card fees and ACH/electronic check fees are only absorbed by the utility under the PUC's order if payments are made. For the period commencing on the date provided in response to number 5 through the most recent date available (identify the date), please provide the following:

(NBC should provide the amount after June 30; KCWA's credit card fees were addressed in its rate case, so the responses to those questions would be N/A and its interest fee waiver was through the end of the Commission's orders in this docket, which was July 17 for water utilities)

- a. The total number of accounts on which payments were made.
- b. The number of accounts where payments were made and interest and/or late fees were waived.
- c. The number of accounts where payments were made by credit card/debit card.
- d. The number of accounts where payments were made by ACH/electronic check.
- e. The dollar amount of credit card/debit card fees absorbed by the utility that would have otherwise been assessed to the customer paying with a credit card/debit card.
- f. The dollar amount of ACH/electronic check absorbed by the utility that would have otherwise been assessed to the customer paying through ACH/electronic check.
- g. The dollar amount of waived late fees on accounts where payments were made.
- h. The dollar amount of waived interest fees on accounts where payments were made.

Response:

a. Total number of accounts with payments made:

	Accounts
Month	with
Ending	Payments
4/30/2020	73,269
5/31/2020	70,346
6/30/2020	74,289
7/31/2020	69,219
8/31/2020	68,225
9/30/2020	70,503

b. Number of accounts where interest was waived:

Month Ending	Number of Accounts	Interest Waived	
6/30/2020	21,467	\$ 87,128	
7/31/2020	21,575	88,165	
8/31/2020	21,683	89,203	
9/30/2020	20,700	90,540	
		\$ 355,036	

c. Number of accounts where payments were made by credit card/debit card.

Month	Credit/Debit Card	
Ending	Transactions	
4/30/2020	2,262	April 21 - April 30
5/31/2020	7,299	
6/30/2020	7,258	
7/31/2020	8,280	
8/31/2020	9,178	
9/30/2020	9,571	
	43,848	

d. Number of accounts paid by ACH/electronic check:

	ACH/Electronic
Month	Check
Ending	Transactions
4/30/2020	14,237
5/31/2020	14,865
6/30/2020	14,075
7/31/2020	14,771
8/31/2020	15,022
9/30/2020	15,296
	88,266

e. Total Credit Card Transaction Fees waived:

30

- f. NBC does not charge for ACH/electronic check payments.
- g. Not applicable.
- h. Cannot be determined.
- Comm. 1-8: Please indicate the first date Narragansett Bay Commission sent termination notices to customers with dates not affected by a Commission decision (in other words, the utility could follow through with a physical termination on or after the notice period if payment or a payment arrangement was not made). Please break out by customer class if applicable.

Response: NBC started sending water shut off letters on August 11, 2020.